

The Honorable James L. Robart

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

Maria Mora-Villalpando,

Plaintiff,

v.

U.S. Immigration and Customs Enforcement,
U.S. Customs and Border Protection, and U.S.
Citizenship and Immigration Services,

Defendants.

No. C18-655-JLR

JOINT STATUS REPORT

The parties hereby file this Joint Status Report as required by the Court's Order on the parties' previous joint status report (Dkt. #54). The Court ordered the parties to provide a joint status report within two months concerning their progress with the Court's rulings.

U.S. Immigration and Customs Enforcement ("ICE") has conducted initial searches of the Office of Principal Legal Advisor ("OPLA") Case Management System ("OCMS PLANet"). The parties have discussed those results and agreed to a set of search terms. Therefore, ICE will conduct searches of the database based on the agreed upon search terms.

Joint Status Report
18-655-JLR - 1

UNITED STATES ATTORNEY
700 STEWART STREET, SUITE 5220
SEATTLE, WASHINGTON 98101
(206) 553-7970

1 In addition, U.S. Customs and Immigration Services ("USCIS") will conduct a search of
2 the EDMS database for copies of I-213s created on or after January 20, 2017 once search terms
3 are agreed upon. The parties are continuing to negotiate search terms. Once search terms are
4 agreed upon, USCIS will conduct the search and ICE will review documents prior to production.

5 The parties have agreed that all searches will involve the time frame of January 20, 2017
6 to the present.

7 To keep the Court apprised, the parties will provide the Court with another Joint Status
8 Report within 60 days of this Joint Status Report, unless the Court orders otherwise.

9 Dated this 25th day of November, 2019.

10
11 /s/ Khaled Alrabe

12 Khaled Alrabe, NY Bar Reg. 5542311 (admitted
pro hac vice)

13 NATIONAL IMMIGRATION PROJECT
14 OF THE NATIONAL LAWYERS GUILD
89 South St. Suite 603
Boston, MA 02111
Ph. (617) 412-6794
15 Em. khaled@nipnlg.org

16 /s/ Devin T. Theriot-Orr

17 Devin T. Theriot-Orr, WSBA #33995

18 OPEN SKY LAW, PLLC
20415 72nd Ave. S., Ste. 110
Kent, WA 98032
Ph. (206) 962-5052
19 Fax (206) 681-9663
20 Em. devin@opensky.law

1 BRIAN T. MORAN
2 United States Attorney

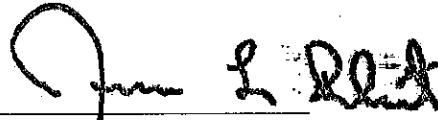
3 s/ Brian C. Kipnis
4 BRIAN C. KIPNIS

5 s/ Sarah K. Morehead
6 SARAH K. MOREHEAD, WSBA #29680
7 Assistant United States Attorneys
8 Office of the United States Attorney
9 Suite 5220, United States Courthouse
10 700 Stewart Street
11 Seattle, Washington 98101-1271
12 Phone: 206-553-7970
13 Fax: 206-553-4073
14 Email: brian.kipnis@usdoj.gov
15 Email: sarah.morehead@usdoj.gov
16
17
18
19
20
21
22
23

ORDER

The parties will submit another joint status report within 60 days of the date of this order.

Dated this 26th day of November, 2019.



James L. Robart
United States District Judge